

Application No.: 10/693,077

Docket No.: 27592-00362-US11

REMARKS

Claims 25-26, 30-31, 37, 41-42 and 44-46 are pending in this application. Claims 25, 37 and 44-46 are independent claims. Claims 25, 37 and 44-46 are amended. Reconsideration and allowance of the present application are respectfully requested.

Entry of Amendment After Final Rejection

Entry of the Amendment is requested under 37 C.F.R. § 1.116 because the Amendment: a) places the application in condition for allowance for the reasons discussed herein; b) does not present any additional claims without canceling the corresponding number of final rejected claims; and/or c) places the application in better form for an appeal, if an appeal is necessary. Entry of the Amendment is thus respectfully requested.

Claim Rejections under 35 U.S.C. §102

Claims 25, 26, 30, 31, 37, 41, 42 and 44-46 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,148,377 to Carter et al. (hereinafter "Carter et al."). This rejection is respectfully traversed.

Carter discloses distributed shared memory systems and processes that can connect into each node of a computer network to encapsulate the memory management operations of the connected node and to provide thereby an abstraction of a shared virtual memory that can span across each node of the network and that optionally spans across each memory device connected to the computer network. See at least the Abstract of Carter.

Applicant submits that Carter does not teach or suggest each of the elements of the pending claims. Each of the pending claims, in part, recites "at least one computer system has a bridge driver to handle communications between an associated network interface and an associated disk subsystem and memory portion." Carter does not teach or suggest these features.

The Office Action indicated that the "bridge driver is broadly interpreted as any device/component that couples Carter's local node's memory and disk portions to the local node's network interface, such device/components include buffers, disk caches, I/O ports and

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any other devices that perform similar functionalities." See the "Response to Argument" section of the Office Action.

Notwithstanding the Office Action's interpretation of the bridge driver of the present application, Carter does not disclose or suggest "any device/component" that "handle communications between an associated network interface and an associated disk subsystem and memory portion." Although there is communication between Carter's computer system's associated network interface and disk subsystem, one skilled in the art would not assume the method of handling such communication to be with at least one computer system that "has a bridge driver to handle communications between an associated network interface and an associated disk subsystem and memory portion."

Col. 12 lines 29-46 of Carter discloses that

The local RAM cache 76 provides storage for memory pages and their attributes. In one embodiment, the local RAM cache 76 provides a global address index for accessing the cached pages of the distributed memory and the attributes based on that page. In this embodiment, the local ram cache 76 provides the index by storing in memory a list of each global address cached in the local RAM. With each listed global address, the index provides a pointer into a buffer memory and to the location of the page data. Optionally, with each listed global address, the index can further provide attribute information including a version tag representative of the version of the data, a dirty bit representative of whether the RAM cached data is a copy of the data held on disk, or whether the RAM cached data has been modified but not yet flushed to disk, a volatile bit to indicate if the page is backed by backing store in persistent memory, and other such attribute information useful for managing the coherency of the stored data.

The present invention, on the other hand, teaches a novel system architecture and method that includes at least one computer system that "has a bridge driver to handle communications between an associated network interface and an associated disk subsystem and memory portion." The pending claims, therefore, recite a bridge driver the "handles communications between an associated network interface and an associated disk subsystem and memory portion." As noted in page 8 of the current application, the architecture and method of the computer system used in the present invention improves performance over traditional methods and provides for a peer-to-peer direct solution.

While Carter teaches means on each computer on a local node to access the global distributed address space including the global distributed cache, there is no teaching or

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suggestion in Carter that any of its computer node includes "a bridge driver to handle communications between an associated network interface and an associated disk subsystem and memory portion," as recited in the pending claims. Therefore, Applicants respectfully request that this rejection of claims 25, 26, 30, 31, 37, 41, 42 and 44-46 under 35 U.S.C. §102 be withdrawn.

Disclaimer

Applicants may not have presented all possible arguments or have refuted the characterizations of either the claims or the prior art as found in the Office Action. However, the lack of such arguments or refutations is not intended to act as a waiver of such arguments or as concurrence with such characterizations.

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CONCLUSION

In view of the above, consideration and allowance are respectfully solicited.

In the event the Examiner believes an interview might serve in any way to advance the prosecution of this application, the undersigned is available at the telephone number noted below.

The Office is authorized to charge any necessary fees to Deposit Account No. 22-0185.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 22-0185, under Order No. 27592-00362-US11 from which the undersigned is authorized to draw.

Dated: March 23, 2009

Respectfully submitted,

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